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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DIAMOND RESORTS INTERNATIONAL,
INC., a Delaware corporation; DIAMOND
RESORTS CORPORATION, a Maryland
corporation; DIAMOND RESORTS U.S.
COLLECTION DEVELOPMENT, LLC, a
Delaware limited liability company; and
DIAMOND RESORTS MANAGEMENT, INC.,
an Arizona corporation,

Plaintiffs,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED, an
individual and citizen of the State of Washington;
TREVOR HEIN, an individual and citizen of
Canada; THOMAS PARENTEAU, an individual
and citizen of the State of Washington; HAPPY
HOUR MEDIA GROUP, LLC, a Washington
limited liability company; MITCHELL R.
SUSSMAN, ESQ., d/b/a THE LAW OFFICES
OF MITCHELL REED SUSSMAN &
ASSOCIATES, an individual and citizen of the
State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a Washington
professional services corporation; and KEN B.
PRIVETT, ESQ., a citizen of the State of
Oklahoma,

Defendants.

Case No. 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER
REGARDING MITCHELL R.
SUSSMAN'S RESPONSE TO THE
AMENDED COMPLAINT FOR
DAMAGES AND INJUNCTIVE RELIEF
[ECF 59]**

(First Request)

Plaintiffs Diamond Resorts International, Inc., Diamond Resorts Corporation, Diamond Resorts U.S. Collection Development, LLC, and Diamond Resorts Management, Inc. (“Diamond”), and Defendant Mitchell R. Sussman d/b/a The Law Offices of Mitchell Reed Sussman & Associates (“Sussman”), by and through their respective counsel, stipulate and agree as follows:

1. On January 4, 2019, Diamond filed an Amended Complaint for Damages and Injunctive Relief [ECF 59], naming Sussman as a Defendant for the first time (the “Amended Complaint”);

2. Diamond served Sussman pursuant to California Code of Civil Procedure § 415.20.

3. Because this matter has been pending for more than one year prior to Sussman being named as a Defendant, he and his counsel require additional time to get up to speed before responding to the Amended Complaint.

4. Diamond and Sussman have agreed that Sussman shall respond to the Amended Complaint on or before February 28, 2019.

5. This is the first stipulation to extend the deadline to file a response to the Amended Complaint. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 5th day of February, 2019.

DATED this 5th day of February, 2019.

SHUTTS & BOWEN LLP

BAILEY ♦ KENNEDY

By: /s/ Daniel Barsky
DANIEL J. BARSKY
200 South Biscayne Blvd., Suite 4100
Miami, FL 33131

By: /s/ Joseph Liebman
JOSEPH A. LIEBMAN
8984 Spanish Ridge Avenue
Las Vegas, NV 89148

Attorneys for Diamond

Attorneys for Sussman

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

2-5-2019
DATED: _____

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY❖KENNEDY and that on the 5th day of February, 2019, service of the foregoing **STIPULATION AND ORDER REGARDING MITCHELL R. SUSSMAN'S RESPONSE TO THE AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF [ECF 59] (First Request)** was made by mandatory electronic service through the United States District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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/s/ Sharon L. Murnane
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